

**REMARKS**

In the Office Action, claims 1-3 and 5-13 were rejected and claims 23-27 were allowed. Reconsideration and allowance of all pending claims are requested in view of the remarks set forth below.

**Rejections Under 35 U.S.C. § 102**

In the Office Action, the Examiner rejected claims 1, 3 and 8-10 under 35 U.S.C. § 102(b) as being anticipated by Anderson (U.S. Patent No. 4,750,258 hereinafter "Anderson"). Specific to independent claim 1, Examiner stated:

With regard to claim 1, Anderson teaches a method of inserting windings, comprising:

- disposing a stator (Fig. 13, 3) having a plurality of stator leads (Fig. 13, G1-G3) into a lead separating assembly (Fig. 1, 1), the leads extending beyond the stator (Fig. 14, G3A or G3B) from windings installed in stator slots (Fig. 14, s [sic]);
- gathering the plurality of stator leads together into a bundle (Fig. 13, G1A or G2A or G3b); and
- driving a lead separator (Fig. 14, 13) through the stator (Fig. 14, 3 [sic]) into engagement with the plurality of stator leads (Fig. 14, G1A or G2A or G3B) gathered together to separate each of the plurality of stator leads gathered together.

Final Office Action, pages 2-3. The Applicants respectfully traverse this rejection.

***Legal Precedent***

A *prima facie* case of anticipation under 35 U.S.C. § 102 requires a showing that each limitation of a claim is found in a single reference, practice or device. *In re Donohue*, 226 U.S.P.Q. 619, 621 (Fed. Cir. 1985).

***Omitted Features from Independent Claim 1***

The Applicants respectfully submit that the rejection of independent claim 1 is improper because the prior art reference that is used to reject the claim does not show each and every element recited by the claim.

Anderson Does Not Teach Disposing a Stator Having a Plurality of Stator Leads into a Lead Separating Assembly

Independent claim 1 recites disposing a stator into “*a lead separating assembly, the leads extending beyond the stator from windings installed in stator slots.*” (Emphasis added). Accordingly, the subject matter recited by the claim addresses separating leads formed from stator windings *already* inserted into stator slots.

In contrast, Anderson discloses an apparatus configured to *insert windings* into the slots of a stator. *See* Anderson, Abstract (emphasis added). The leads, in the context of the present application, are only separated after the windings are inserted into the slots of the stator. In fact, a device like that of Anderson could be used to *insert the windings* before the lead separating assembly disclosed in the present application would be used to *separate the leads* of the windings. Anderson simply does not address how to separate the leads once the windings are inserted into the stator slots. Therefore, Anderson fails to disclose *a lead separating assembly*, whereby the *leads* extend beyond the stator from windings installed in stator slots, as recited by claim 1.

The Examiner cited Figs. 13 and 14 of the Anderson reference in rejecting claim 1. Final Office Action, page 2. However, these figures illustrate how the assembly in Anderson *installs windings* in a stator slot that was previously empty. Therefore, these figures do not address the leads extending from windings already installed in stator slots, as recited in claim 1.

Further, the fundamental differences in the method of the present application and the apparatus in Anderson are revealed by the contradictory language used by the Examiner in the rejection of claim 1. The Examiner initially noted that Anderson teaches a “method of inserting windings.” Final Office Action, page 2. However, in the first bullet point following this statement, the Examiner claimed that Anderson teaches

“disposing a stator having . . . windings installed in stator slots.” *Id.* It stands to reason that the apparatus disclosed by Anderson for inserting windings would not require disposing a stator having windings already inserted.

Anderson Does Not Teach Gathering the Plurality of Stator Leads Together into a Bundle

The Examiner relied on Fig. 13 of Anderson in asserting that the reference teaches “gathering the plurality of stator leads together into a bundle,” as recited in claim 1 of the present application. However, Fig. 13 of Anderson involves the “axial insertion of the . . . various coil groups into their respective slots S of the stator so as to constitute the windings W of the stator.” Anderson, col. 11, ll. 37-40. Therefore, this figure is only pertinent to gathering and inserting the windings into the stator slots. As previously discussed, the stator leads themselves are comprised of bundles of wire leading from the windings already inserted in the stator slots. Therefore, Anderson does not teach “gathering the plurality of stator *leads*.”

Anderson Does Not Teach Driving a Lead Separator into Engagement with the Plurality of Stator Leads

The Examiner relied on Fig. 14 of Anderson in asserting that the reference teaches “driving a lead separator into engagement with the plurality of stator leads,” as recited in claim 1 of the present application. However, Fig. 14 of Anderson illustrates the fully operative position of the assembly as the apparatus completes the *axial insertion* of the windings. Anderson, col. 12, ll. 19-23 (emphasis added). Thus, this apparatus only engages and inserts the windings and does not separate the leads resulting from the insertion of the windings. Therefore, Anderson does not teach “engagement with the plurality of stator *leads*.”

**Rejections Under 35 U.S.C. § 103**

In the Office Action, the Examiner rejected claims 2, 5-7 and 11-13 under 35 U.S.C. § 103(a) as being unpatentable over Anderson. The Applicants respectfully traverse the rejection.

The Applicants respectfully submit that claims 2, 5-7 and 11-13 are allowable based on their dependencies on independent claim 1, which the Applicants believe is allowable in view of the remarks set forth above. For at least these reasons, the Applicants respectfully assert that the Examiner has clearly not established a *prima facie* case of obviousness with regard to claims 2, 5-7 and 11-13. Accordingly, the Applicants respectfully request that the Examiner withdraw the rejection and allow claims 2, 5-7 and 11-13.

**Rebuttal to Examiner's Response to Arguments**

The Examiner responded to the Applicants' arguments from the First Office Action by stating:

Applicants' arguments with respect to claims 21-31 have been considered but are moot in view of the new ground(s) of rejection. Furthermore, the prior art or any prior art teaches the leads to be extended beyond the stator from windings installed in stator slots in order to bring current or power to the stator, which reads on the amendment of claim 1, line 3.

Final Office Action, p.6.

The Applicants respectfully note that claims 1-13 and 23-27 are pending in the application. Therefore, the Examiner's reference to claims 21-31 has no basis. Further, the Examiner referred to "new ground(s) of rejection." However, the Examiner cited the same reference and statutory sections as in the First Office Action in rejecting the claims in the Final Office Action.

Moreover, the Examiner's statement appears to indicate a fundamental misunderstanding. The Applicants' intended purpose for the amendment of claim 1 was to clarify that the present application pertains to *leads* extending from windings *already inserted* in stator slots. As previously discussed, Anderson discloses an apparatus configured to *insert windings* into the slots of a stator and does not address how to *separate the leads* once the windings are installed. See Anderson, Abstract (emphasis added). Anderson is simply silent as to how the leads are handled at all, much less separated. Therefore, claim 1, as amended, does not read on the Anderson reference.

### Conclusion

In view of the remarks set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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